

Hon. Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COSMOS GRANITE (WEST), LLC, a
Washington limited liability company,

Plaintiff,

v.

MINAGREX CORPORATION, d/b/a MGX
Stone,

Defendant.

Case No. 2:19-cv-01697-RSM

**STIPULATED MOTION AND ORDER
FOR EXTENSION OF CERTAIN
DEADLINES**

WHEREAS, on April 15, 2020, the Court signed an Order for Extension of Certain Deadlines (Dkt. No. 30);

WHEREAS, due to the continued unprecedented effects of the COVID-19 pandemic, and the challenges and difficulties associated with conducting discovery under Washington's stay-at-home order, the parties determined that a change to the dates and schedule previously set by the Court and agreed to by the parties is necessary;

WHEREAS, the parties have agreed to extend certain deadlines due to the due to the challenges and difficulties associated with conducting discovery under Washington's stay-at-home order;

WHEREAS, the parties believe that the Court is well acquainted with the circumstances of this national health emergency, and is more than likely aware of the general nature of the impact

on law firms during this uncertain time; however, should the Court require declarations explaining the impact of the COVID-19 pandemic of their respective counsel's law firms, the parties are more than willing to articulate specific circumstances supporting good cause for this modification.

IT IS HEREBY STIPULATED AND AGREED by and through the undersigned counsel for Plaintiff and Defendant, in accordance with LCR 7(d)(1) and 10(g), subject to the approval of the Court, that trial be continued from January 11, 2021 to June 14, 2021 or as soonest thereafter as the Court permits, and the deadlines in the shall be modified as set forth below:

Event Title	Current Deadline	Proposed Amended Deadline
JURY TRIAL DATE	January 11, 2021	June 14, 2021
Disclosure of Expert Testimony under FRCP 26(a)(2)	July 15, 2020	December 16, 2020
All Motions Related to Discovery must be filed by (<i>see</i> LCR 7(d))	August 14, 2020	January 15, 2021
Discovery Completed by	September 14, 2020	February 15, 2021
All dispositive motions must be filed by and noted on the motion calendar no later than the fourth Friday thereafter (<i>see</i> LCR 7(d))	October 13, 2020	March 16, 2021
Mediation per LCR 39.1(c)(3), if requested by the parties , held no later than	November 27, 2020	April 30, 2021
All motions in limine must be filed by and noted on the motion calendar no later than the THIRD Friday thereafter	December 14, 2020	May 17, 2021
Agreed pretrial order due	December 30, 2020	June 2, 2021
Pretrial conference to be scheduled by the Court.		

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	Trial briefs, proposed voir dire questions, jury instructions, neutral statement of the case, and trial exhibits due	January 6, 2020	June 9, 2021
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DATED this 10th day of June, 2020.

SUSMAN GODFREY L.L.P.

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Attorneys for Defendant

ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED this 12th day of June, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

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